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24 *Attorneys for Defendants Ceruvia Lifesciences LLC*
25 and *Carey Turnbull*

26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 SCOTT FREEMAN, M.D., as trustee for the
1 SCOTT MITCHELL FREEMAN
2 REVOCABLE LIVING TRUST, dated March
3 10, 2012, for itself and as assignee of
4 FERDINAND BELGA,

5 Plaintiff,

6 v.

7 STEPHEN HURST; SUNRAY ASSET
8 MANAGEMENT, INC., NICO FORTE,
9 CERUVIA LIFESCIENCES f/k/a CH-TAC;
10 CAREY TURNBULL; RUSSELL BURBANK,
11 as liquidating trustee for nominal defendants
12 SAVANT ADDICTION MEDICINE, LLC and
13 SAVANT HWP HOLDINGS, LLC; DOE

14 Case No. 2:22-cv-01433-RFB-VCF
15 (Consolidated with 2:22-cv-01903-JCM-BNW)

16 **STIPULATED MOTION AND ORDER**
17 **TO EXTEND DEADLINE FOR**
18 **CERUVIA LIFESCIENCES AND**
19 **CAREY TURNBULL TO FILE REPLY**
20 **IN SUPPORT OF MOTION TO**
21 **DISMISS (ECF NO. 62) AND IN**
22 **RESPONSE TO PLAINTIFF'S**
23 **OPPOSITION (ECF NO. 85)**

24 (FIRST REQUEST)

1 INDIVIDUALS 1 through 20; and ROSE
2 CORPORATIONS 1 through 20,

3 Defendants,

4 AND

5 SAVANT ADDICTION MEDICINE, LLC;
6 SAVANT HWP HOLDINGS, LLC; and
SAVANT HWP HOLDINGS, LLC,

7 Nominal Defendants.

8
9 Defendants CAREY TURNBULL and CERUVIA LIFESCIENCES LLC (“*Ceruvia*
10 *Defendants*”) and Plaintiff SCOTT FREEMAN, M.D., AS TRUSTEE FOR THE SCOTT
11 MITCHELL FREEMAN REVOCABLE LIVING TRUST, DATED MARCH 10, 2012, FOR
12 ITSELF AND AS ASSIGNEE OF FERDINAND BELGA (“*Plaintiff*”) hereby stipulate to an
13 extension of time for the Ceruvia Defendants to file their reply brief in support of their Motion to
14 Dismiss (ECF No. 62) and in response to Plaintiff’s opposition brief (ECF No. 85) to May 15,
15 2023.

16 Good cause exists for this extension as the Ceruvia Defendants and Plaintiff are involved
17 in substantive settlement discussions that may resolve the dispute as between these parties. To
18 avoid further incurrence of attorneys’ fees and costs, and any further use of judicial resources
19 related to disposition of the Ceruvia Defendants’ motion, the parties request this extension to
20 permit an opportunity to reach resolution of their dispute.

1 This is the parties' first request to extend the Ceruvia Defendants' reply brief deadline.

2 Dated this 23rd day of February, 2023.

3 **LEWIS ROCA ROTHGERBER**
4 **CHRISTIE LLP**

5 /s/ Abraham G. Smith
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32 *Attorneys for Defendants Ceruvia
33 Lifesciences LLC and Carey Turnbull*

34 **IT IS ORDERED.**

35 
36 RICHARD F. BOULWARE, II
37 UNITED STATES DISTRICT JUDGE

38 DATED this 24th day of February, 2023.